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11 (See Signature Page for Names and Addresses  
12 of Additional Counsel)

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

15 NATIONAL CREDIT UNION  
16 ADMINISTRATION BOARD,  
17 as Liquidating Agent of U.S. Central  
18 Federal Credit Union and of Western  
19 Corporate Federal Credit Union,

20 Plaintiff,

21 vs.

22 GOLDMAN, SACHS & CO., GS  
23 MORTGAGE SECURITIES CORP.,

24 Defendants.

Case No. CV-11-6521 GW(JEMx)

**STIPULATION TO VACATE  
AND RESET THE BRIEFING  
AND HEARING SCHEDULE  
FOR SUMMARY JUDGMENT  
MOTIONS**

Am. Compl. filed: Nov. 14, 2014

Judge: Hon. George Wu

Courtroom: 10

Hearing Date: January 25, 2016

Hearing Time: 8:30 a.m.

1 This Stipulation is entered into by and between counsel for plaintiff National  
2 Credit Union Administration Board, as Liquidating Agent of U.S. Central Federal  
3 Credit Union and of Western Corporate Federal Credit Union (“NCUA”), and counsel  
4 for defendants Goldman, Sachs & Co. and GS Mortgage Securities Corp. (“Goldman  
5 Sachs”).

6 WHEREAS, fact discovery closed July 17, 2015, and expert discovery closes  
7 January 15, 2016, *see* Master Discovery Protocol (“MDP”) § 12(b)-(c), ECF No. 313  
8 (Apr. 9, 2014);

9 WHEREAS, summary judgment motions are currently scheduled to be filed no  
10 later than February 5, 2016, and fully submitted on March 25, 2016, *see id.* § 12(d);

11 WHEREAS, “in light of the appeals in the California actions pending before the  
12 Ninth Circuit,” trial has not been scheduled in this action, ECF No. 447 (July 30,  
13 2015);

14 WHEREAS, the appeals before the Ninth Circuit were argued December 8,  
15 2015;

16 WHEREAS, because trial has yet to be scheduled, the parties believe the  
17 briefing schedule for summary judgment should be reset;

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by  
19 and among Goldman Sachs and NCUA, through their undersigned counsel, subject to  
20 the approval of the Court, as follows:  
21

- 22 (1) Summary judgment motions shall be filed no later than August 19, 2016;
  - 23 (2) Responses to summary judgment motions shall be filed no later than  
24 October 3, 2016; and
  - 25 (3) Replies to summary judgment motions shall be filed no later than  
26 November 2, 2016.
- 27  
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1 Dated: December 28, 2015

2 Respectfully submitted,

3 /s/ Brendan P. Cullen

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28

Respectfully submitted,

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*Credit Union Administration Board*

1 Pursuant to Local Rule 5-4.3.4(a)(2), the filer attests that the concurrence in the  
2 filing of this document has been obtained from each of the above signatories.

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4 Dated: December 28, 2015 /s/ Wan J. Kim  
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